

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Lead Case: No. 1:19-cv-977-ADA

*(Consolidated with No. 6:19-cv-255-ADA
and No. 6:19-cv-256-ADA)*

JURY TRIAL DEMANDED

**PLAINTIFF VLSI TECHNOLOGY LLC’S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO DEFENDANT INTEL CORPORATION’S OPPOSED
MOTION FOR LEAVE TO FILE AMENDED ANSWER, DEFENSES, AND
COUNTERCLAIMS AND TO SEVER AND STAY DEFENSE OF LICENSE (DKT. 349)**

Plaintiff, VLSI Technology LLC (“VLSI”), moves for an extension of time to respond to Defendant Intel Corporation’s Opposed Motion for Leave to File Amended Answer, Defenses, and Counterclaims and to Sever and Stay Defense of License up to and including November 25, 2020 and shows as follows:

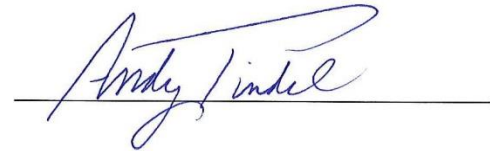
1. Defendant Intel Corporation’s (“Intel”) Opposed Motion for Leave to File Amended Answer, Defenses, and Counterclaims and to Sever and Stay Defense of License (“Intel’s Motion”) was filed in the above styled actions on November 11, 2020. Western District of Texas Local Court Rule CV-7(e) provides that “[a] response to a nondispositive motion shall be filed not later than 7 days after the filing of the motion.” The operation of Local Rule CV-7(e) establishes a deadline of November 18, 2020 for VLSI to file a response to Intel’s Motion. VLSI requests the Court to grant it a seven (7) day extension of the current deadline, up to and including November 25, 2020, for filing a response to Intel’s Motion.

2. Good cause for the requested seven (7) day extension of time for VLSI to file a response to Intel's Motion is shown in that additional time is needed by VLSI in order to adequately research and respond to the factual and legal matters raised in said motion. Attorneys for VLSI met and conferred with attorneys for Intel with respect to the instant motion and Intel is unopposed to the relief requested herein.

PREMISES CONSIDERED, Plaintiff VLSI Technology LLC requests the Court to extend the deadline for filing a response to Defendant Intel Corporation's Opposed Motion for Leave to File Amended Answer, Defenses, and Counterclaims and to Sever and Stay Defense of License for an additional seven (7) days, up to and including November 25, 2020, and for such other and further relief as the Court deems suitable and just.

Respectfully submitted,

Dated: November 17, 2020



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Keith Orso (*pro hac vice*)
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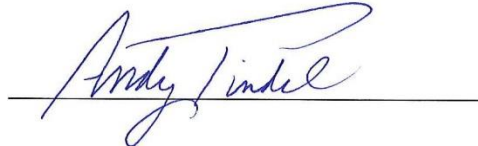
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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE] — Document Filing System, to all counsel of record, on this 17th day of November, 2020.

A handwritten signature in blue ink, reading "Andy Tindel", is written over a horizontal line.

Andy Tindel

CERTIFICATE OF CONFERENCE

On November 16, 2020, undersigned counsel for VLSI communicated with Steve Ravel, local counsel for Intel, concerning the foregoing motion and Mr. Ravel advised that Intel was not opposed to the grant of VLSI's requested seven (7) day extension of time.

A handwritten signature in blue ink, reading "Andy Tindel", is written over a horizontal line.

Andy Tindel